

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

DONNA F. COLLINS, et. al.,	:	
	:	
Plaintiff	:	
	:	
v.	:	CASE NO.: 1:13-cv-00532-WDQ
	:	
WAL-MART STORES EAST,	:	
LP, et. al	:	
	:	
Defendant	:	

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

COME NOW the Defendants, Wal-Mart Stores East, LP and Wal-Mart Stores, Inc., by and through their attorneys, Warren D. Stephens and DeCaro, Doran, Siciliano, Gallagher & DeBlasis, LLP, and hereby move this Honorable Court for Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, and in support thereof state as follows:

1. In this slip and fall case, Plaintiffs cannot produce evidence of actual or constructive notice sufficient to overcome Summary Judgment.
2. There is no dispute as to any material fact.
3. There is no dispute as to the applicable law.
4. And for the reasons as set forth in the attached Memorandum of Fact and Law in support of the Motion.

WHEREFORE, the Defendants, Wal-Mart Stores East, LP and Wal-Mart Stores, Inc., are entitled to Summary Judgment as a matter of law.

Respectfully submitted,

DeCARO, DORAN, SICILIANO,
GALLAGHER & DeBLASIS, LLP

/s/ "Warren D. Stephens"

Warren D. Stephens
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Counsel for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this ____ day of August, 2013, a copy of the foregoing Defendants' Motion for Summary Judgment was served by efilng, and forwarded, postage prepaid, via First Class mail, to:

Louis G. Close, III, Esquire
Christopher T. Casciano, Esquire
403 Central Avenue
Towson, Maryland 21204
Counsel for Plaintiffs

/s/ "Warren D. Stephens"

Warren D. Stephens